

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

DEMETRIUS HILL	:	CASE NO. 7:08-CV-00283
Plaintiff,	:	JUDGE JAMES C. TURK
	:	Senior United States District Judge
-vs-	:	
TERRY O'BRIEN, et al.	:	<u>MOTION FOR ADMISSION OF</u>
Defendants.	:	<u>OUT OF STATE ATTORNEY FOR</u>
	:	<u>REPRESENTATION OF PLAINTIFF</u>
	:	<u>DEMETRIUS HILL</u>

Now comes Plaintiff, Demetrius Hill, and hereby moves this Court to grant an Order permitting out of state counsel to enter her appearance as legal representative of Demetrius Hill in the above-referenced matter. Attorney Arlene Sokolowski-Craft offers the following information in support of Plaintiff's Motion:

- 1) Plaintiff Hill is currently incarcerated in Youngstown, Ohio. Attorney Arlene Sokolowski-Craft practices within the State of Ohio. In particular, Attorney Sokolowski-Craft practices before the Northern District of Ohio and therefore has knowledge and experience in this Court's Pacer and ECF programs.
- 2) Attorney Sokolowski-Craft is prepared and willing to provide representation to Mr. Hill. Counsel has educated herself on this Court's local rules and is knowledgeable with this District's case law, practices and procedures.
- 3) Attorney Arlene Sokolowski-Craft has contacted opposing counsel to inform counsel of this Motion to the Court. Opposing counsel is aware of counsel's request.

4) Counsel is aware of the Pro Hac Vice process that this Court's local rules provide. Due to Plaintiff Hill's incarceration, he does not maintain any funds to compensate any attorney to administer a Pro Hac Vice in this matter. Attorney Sokolowski-Craft is prepared to educate herself in this Court's rules and procedures and to zealously represent Plaintiff. Due to the fact that Plaintiff cannot afford counsel at all, acquiring a pro hac vice status for Attorney Sokolowski-Craft is not feasible.

5) Mr. Hill is incarcerated in Ohio for another matter unrelated to this case. As such, Plaintiff faces numerous issues dealing with discovery, obtaining all of his records from his previous location of incarceration, filing of documents and overall communications with opposing counsel. Attorney Sokolowski-Craft believes that she can be of assistance to Mr. Hill and assist in moving this process through the judiciary in a much more productive fashion. Currently, Mr. Hill's incarceration in Ohio provides several dilemmas relating to transfer of discovery, documents and even the transfer of Mr. Hill himself back to Virginia.

Based on the foregoing, attorney Arlene Sokolowski-Craft hereby respectfully requests that this Court grant Plaintiff's Motion to permit outside counsel to practice before this Court on only this particular matter without obtaining a Pro Hac Vice.

Respectfully submitted,

/s/ Arlene Sokolowski-Craft
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Arlene Sokolowski-Craft
ARLENE SOKOLOWSKI-CRAFT
(0073935)